

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS PRODUCTS  
LIABILITY LITIGATION

No. 2:15-MD-02641-DGC

**SECOND AMENDED MASTER  
SHORT FORM COMPLAINT FOR  
DAMAGES FOR INDIVIDUAL  
CLAIMS AND DEMAND FOR JURY  
TRIAL**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).  
Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Tobie Raychelle Whipple Christensen

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
consortium claim:

Kurt Christensen

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
conservator):

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence  
at the time of implant:

Nevada

1           5.     Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence  
2                     at the time of injury:

3                     Nevada

4           6.     Plaintiff's current state(s) [if more than one Plaintiff] of residence:

5                     Nevada

6           7.     District Court and Division in which venue would be proper absent direct  
7                     filing:

8                     United States District Court - Northern Nevada Division

9           8.     Defendants (check Defendants against whom Complaint is made):

10                   ☒     C. R. Bard Inc.

11                   ☒     Bard Peripheral Vascular, Inc.

12           9.     Basis of Jurisdiction:

13                   ☒     Diversity of Citizenship

14                   ☐     Other: \_\_\_\_\_

15           a.     Other allegations of jurisdiction and venue not expressed in Master  
16                     Complaint:

17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20           10.    Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making  
21                     a claim (Check applicable Inferior Vena Cava Filter(s)):

22                   ☐     Recovery<sup>®</sup> Vena Cava Filter

23                   ☐     G2<sup>®</sup> Vena Cava Filter

24                   ☐     G2<sup>®</sup> Express Vena Cava Filter

25                   ☒     G2<sup>®</sup> X Vena Cava Filter

26                   ☐     Eclipse<sup>®</sup> Vena Cava Filter

27                   ☐     Meridian<sup>®</sup> Vena Cava Filter

28

☐ Other(s): \_\_\_\_\_ (please state the facts supporting this Count in the space immediately below)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

RESPECTFULLY SUBMITTED this 29th day of August, 2019.

**[SIGNATURE BLOCK]**

By: /s/ Bill Bradley

**[Attorney name/address]**

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I hereby certify that on this 29th day of August, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Erika Gentile